

**PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW (ENSR)
OFFICE OF AIR MANAGEMENT
AND
CITY OF EVANSVILLE ENVIRONMENTAL
PROTECTION AGENCY**

**Whirlpool Corporation
5401 U.S. 41 North
Evansville, Indiana 47727**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T163-7467-00022	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]
- A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
- A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
- A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]
- B.2 Definitions [326 IAC 2-7-1]
- B.3 Permit Term [326 IAC 2-7-5(2)]
- B.4 Enforceability [326 IAC 2-7-7(a)]
- B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]
- B.6 Severability [326 IAC 2-7-5(5)]
- B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]
- B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]
- B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]
- B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]
- B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]
- B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3),(13)] [326 IAC 2-7-6(1),(6)]
- B.13 Emergency Provisions [326 IAC 2-7-16]
- B.14 Permit Shield [326 IAC 2-7-15]
- B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]
- B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]
- B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
- B.18 Permit Renewal [326 IAC 2-7-4]
- B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]
- B.20 Permit Revision Under Economic Incentives and Other Programs
- B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]
- B.22 Operational Flexibility [326 IAC 2-7-20]
- B.23 Construction Permit Requirement [326 IAC 2]
- B.24 Inspection and Entry [326 IAC 2-7-6(2)]
- B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]
- B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]
- B.27 Enhanced New Source Review [326 IAC 2]

C SOURCE OPERATION CONDITIONS

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Major Source
- C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates
- C.3 Opacity [326 IAC 5-1]
- C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]
- C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2]
- C.6 Fugitive Dust Emissions [326 IAC 6-4]
- C.7 Operation of Equipment [326 IAC 2-7-6(6)]
- C.8 Stack Height [326 IAC 1-7]
- C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

Testing Requirements [326 IAC 2-7-6(1)]

- C.10 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.11 Compliance Schedule [326 IAC 2-7-6(3)]
- C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

C.13 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS

- One (1) Small Parts/Door Paint Line, identified as EU3

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-7]
- D.1.3 Volatile Organic Compounds (VOC) [40 CFR 60.452, Subpart SS]
- D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]
- D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.1.7 Volatile Organic Compounds (VOC)
- D.1.8 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.9 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.10 Record Keeping Requirements
- D.1.11 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS

- One (1) natural gas fired boiler (Boiler No. 2), identified as EU4**
- One (1) natural gas fired boiler (Boiler No. 5), identified as EU7**
- One (1) natural gas fired boiler (Boiler No. 3), identified as EU12**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]
- D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]
- D.2.3 Emission Offset Minor Modification Limit [326 IAC 2-3]
- D.2.4 New Source Performance Standard (NSPS) [326 IAC 12 and 40 CFR 60]

Compliance Determination Requirements

- D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]
- D.2.6 Sulfur Dioxide Emissions and Sulfur Content
- D.2.7 NSPS Testing Requirement

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.8 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

D.2.10 Reporting Requirements

D.3 FACILITY OPERATION CONDITIONS

- One (1) Black Paint System (metal parts are being coated), identified as EU2

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.3.2 Volatile Organic Compound (VOC) [326 IAC 8]

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Particulate Matter (PM)

D.3.6 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

D.4 FACILITY OPERATION CONDITIONS

- One (1) Thermoplastic Liner System, identified as EU1

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

D.4.2 Volatile Organic Compound (VOC) [326 IAC 8]

Compliance Determination Requirements

D.4.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.4 Particulate Matter (PM)

D.4.5 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.6 Record Keeping Requirements

D.5 FACILITY OPERATION CONDITIONS

- One (1) Expanded Polystyrene Process, identified as F12

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compound (VOC) [326 IAC 8]

D.5.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6 FACILITY OPERATION CONDITIONS

-Miscellaneous VOC use (lubricants, oils, and solvents), identified as F13

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Emission Limitations and Standards

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7 FACILITY OPERATION CONDITIONS - Insignificant Activities

- One (1) 1.527 MMBtu per hour Natural Gas-fired Boiler

Certification

Emergency/Deviation Occurrence Report

Natural Gas Fired Boiler Certification

Monthly Report

Quarterly Report

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM) and City of Evansville Environmental Protection Agency. The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary household refrigerators and ice makers manufacturing plant.

Responsible Official: Al Holaday
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
SIC Code: 3632 and 3585
County Location: Vanderburgh County
County Status: Attainment or Unclassifiable for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Small Parts/Door Paint Line (metal parts are being coated), identified as EU3, with a maximum capacity of seven-hundred and twenty-five units per hour (725 units/hr), using baffles and dry filters as control, and exhausting to stacks S3-1 through S3-10. This process consist of six (6) paint areas and one (1) paint bake oven rated at ten million British thermal units per hour (10 MMBtu/hr).
- (b) One (1) natural gas fired boiler (Boiler No. 2), identified as EU4, rated at eighty-five million British thermal units per hour (85 MMBtu/hr), and exhausting to stack S4.
- (c) One (1) natural gas fired boiler (Boiler No. 5) with the capability to burn No. 2 distillate fuel oil as back-up, identified as EU7, rated at ninety-two and seven tenths million British thermal units per hour (92.7 MMBtu/hr), and exhausting to stack S7.
- (d) One (1) natural gas fired boiler (Boiler No. 3) with the capability to burn No. 2 distillate fuel oil as back-up, identified as EU12, rated at thirty-three and five-tenths million British thermal units per hour (33.5 MMBtu/hr), and exhausting to stack S12.
- (e) One (1) Black Paint System (metal parts are being coated), identified as EU2, with a maximum capacity of one-thousand one-hundred and seventy-eight units per hour (1,178 units/hr), using baffles as control (flow coat paint booth only) and exhausting to stacks S2-1 and S2-2.
- (f) One (1) Thermoplastic Liner System, identified as EU1, with a maximum usage of eleven-thousand pounds per hour (11,000 lb/hr) of raw material, and exhausting to stack S1-1.

- (g) One (1) Expanded Polystyrene Process, identified as F12, with a maximum usage of five-hundred pounds per hour (500 lb/hr) of raw material, and exhausting to room.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- One (1) Natural Gas-fired Boiler less than ten million British thermal units per hour (1.527 MMBtu/hr).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM and City of Evansville Environmental Protection Agency.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

- (c) All terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the City of Evansville Environmental Protection Agency.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

- (b) The Permittee shall furnish to IDEM, OAM, and the City of Evansville Environmental Protection Agency within a reasonable time, any information that IDEM, OAM, and the City of Evansville Environmental Protection Agency may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAM, and the City of Evansville Environmental Protection Agency, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, and the City of Evansville Environmental Protection Agency, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U.S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

Such confidentiality claim shall meet the requirements of 40 CFR 2, Subpart B (when submitting to U.S. EPA) and 326 IAC 17 (when submitting to IDEM, OAM, and the City of Evansville Environmental Protection Agency).

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; or
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

- (a) The Permittee shall annually certify that the source has complied with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due.

If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the City of Evansville Environmental Protection Agency, on or before the date it is due.

- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was based on continuous or intermittent data;
 - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
 - (5) Any insignificant activity that has been added without a permit revision; and
 - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, and the City of Evansville Environmental Protection Agency, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]
[326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, and the City of Evansville Environmental Protection Agency, upon request and shall be subject to review and approval by IDEM, OAM, and the City of Evansville Environmental Protection Agency.

B.13 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, and the City of Evansville Environmental Protection Agency within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967 or

Telephone Number: 812-426-5597 (City of Evansville EPA)

Facsimile Number: 812-426-5651

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Management

100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAM, and the City of Evansville Environmental Protection Agency may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAM, and the City of Evansville Environmental Protection Agency by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:
 - (1) The applicable requirements are included and specifically identified in this permit; or
 - (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, and City of Evansville Environmental Protection Agency shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
 - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
 - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
 - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
 - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, and City of Evansville Environmental Protection Agency has issued the modifications. [326 IAC 2-7-12(c)(7)]

- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, and City of Evansville Environmental Protection Agency has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
 - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) An emergency as defined in 326 IAC 2-7-1(12); or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.
- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, and the City of Evansville Environmental Protection Agency determine any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAM, and the City of Evansville Environmental Protection Agency to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, and the City of Evansville Environmental Protection Agency at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, and the City of Evansville Environmental Protection Agency may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and the City of Evansville Environmental Protection Agency and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the City of Evansville Environmental Protection Agency on or before the date it is due. [326 IAC 2-5-3]
- (2) If IDEM, OAM, and the City of Evansville Environmental Protection Agency, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, and the City of Evansville Environmental Protection Agency, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, and the City of Evansville Environmental Protection Agency, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, and the City of Evansville Environmental Protection Agency fail to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]
[326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(I) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
 - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, and the City of Evansville Environmental Protection Agency in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) **Emission Trades [326 IAC 2-7-20(c)]**
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) **Alternative Operating Scenarios [326 IAC 2-7-20(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, and the City of Evansville Environmental Protection Agency, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]
 - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM, and City of Evansville Environmental Protection Agency or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAM, and City of Evansville Environmental Protection Agency nor an authorized representative, may disclose the information unless and until IDEM, OAM, and City of Evansville Environmental Protection Agency makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
 - (2) The Permittee, IDEM, OAM, and City of Evansville Environmental Protection Agency acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch and the City of Evansville Environmental Protection Agency, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) IDEM, OAM, and the City of Evansville Environmental Protection Agency shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAM, and the City of Evansville Environmental Protection Agency*, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Major Source

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Stack Height [326 IAC 1-7]

Unless prohibited by applicable Federal Aviation Administration (FAA) rules or other state or federal rules pertaining to height limitations for structures adjacent to or near airport runways, the Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.9 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18][40 CFR 61.140]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.10 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

no later than thirty-five (35) days before the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements;
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such requirements that become effective during the term of this permit.

C.12 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) If the ERP is disapproved by IDEM, OAM, and the City of Evansville Environmental Protection Agency, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAM, and the City of Evansville Environmental Protection Agency, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
 - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
 - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
 - (3) A verification to IDEM, OAM, and the City of Evansville Environmental Protection Agency that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAM, and the City of Evansville Environmental Protection Agency that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;
 - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
 - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM and City of Evansville Environmental Protection Agency upon request and shall be subject to review and approval by IDEM, OAM, and City of Evansville Environmental Protection Agency. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
- (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5][326 IAC 2-7-6]

-
- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Contain actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
- (2) Contain actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the City of Evansville Environmental Protection Agency on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM and the City of Evansville Environmental Protection Agency when applicable) may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon request of an IDEM, OAM, and the City of Evansville Environmental Protection Agency representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or City of Evansville Environmental Protection Agency makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or City of Evansville Environmental Protection Agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;

- (5) The results of such analyses; and
- (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Evansville Environmental Protection Agency
Room 250
101 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, and the City of Evansville Environmental Protection Agency on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly or semi-annual report shall be

submitted within thirty (30) days of the end of the reporting period.

- (e) All instances of deviations as described in Section B - Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) Small Parts/Door Paint Line (metal parts are being coated), identified as EU3, with a maximum capacity of seven-hundred and twenty-five units per hour (725 units/hr), using baffles and dry filters as control, and exhausting to stacks S3-1 through S3-10. This process consists of six (6) paint areas and one (1) paint bake oven rated at ten million British thermal units per hour (10 MMBtu/hr).

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the Small Parts/Door Paint Line, identified as EU3, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-7] (Large Appliance Coating Operations)

Pursuant to 326 IAC 8-2-7 (Large Appliance Coating Operations), the volatile organic compound (VOC) content of coatings applied to refrigerators, freezers, etc., shall be limited to 0.34 kilogram per liter of coating (2.8 pounds VOC per gallon) delivered to the applicator less water. The use of quick-drying lacquers used for repair of scratches and nicks are exempt from the above limit but shall be limited to one (1) gallon usage per eight (8) hour period.

D.1.3 Volatile Organic Compounds (VOC) New Source Performance Standards for Industrial Surface Coating: Large Appliances [40 CFR 60.452, Subpart SS]

Pursuant to 40 CFR 60.452, Subpart SS (New Source Performance Standards for Industrial Surface Coating: Large Appliances) the Small Parts/Door Paint Line, identified as EU3 shall not discharge or cause the discharge of VOC emissions that exceed 0.90 kilogram of VOC's per liter (7.5 pounds VOC per gallon) of applied coating solids.

D.1.4 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

Pursuant to Certificate of Operation # 022-030-001, issued on October 18, 1996, the input VOC's from all coatings and solvents employed by the Small Parts/Door Paint Line (EU3) shall be less than 33.5 tons of VOC per month. This will result in a net increase in VOC emissions of less than 40 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.1.6 Testing Requirements [326 IAC 2-7-6(1),(6)]

Pursuant to 40 CFR Part 60.453, Subpart SS, the owner or operator shall determine the composition of the coatings by formulation data supplied by the coating manufacturer or by analysis of each coating, as received, using Reference Method 24, or methods approved by OAM.

D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.8 VOC Emissions

Compliance with Condition D.1.4 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (S3-1 through S3-10) while the booth is in operation. During periods of inclement weather, observations will be performed weather permitting. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.10 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.2, D.1.3 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2, D.1.3 and D.1.4.
 - (1) The amount and VOC content of each coating material and solvent used;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of weekly overspray observations, daily, weekly and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2, D.1.3, and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) One (1) natural gas fired boiler (Boiler No. 2), identified as EU4, rated at eighty-five million British thermal units per hour (85 MMBtu/hr), and exhausting to stack S4. (August 1988)
- (2) One (1) natural gas fired boiler (Boiler No. 5) with the capability to burn No. 2 distillate fuel oil as back-up, identified as EU7, rated at ninety-two and seven-tenths million British thermal units per hour (92.7 MMBtu/hr), and exhausting to stack S7. (Inst. 1973, mod. 1997)
- (3) One (1) natural gas fired boiler (Boiler No. 3) with the capability to burn No. 2 fuel oil as back-up, identified as EU12, rated at thirty-three and five-tenths million British thermal units per hour (33.5 MMBtu/hr), and exhausting to stack S12. (Inst. 1997)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (PM Emission Limitations for Sources of Indirect Heating that were constructed after September 21, 1983) the allowable PM emission rate from the 85 MMBtu/hr boiler (Boiler No. 2), the 92.7 MMBtu/hr boiler (Boiler No. 5), the 33.5 million Btu per hour boiler (Boiler No. 3), shall not exceed twenty-seven hundredths 0.27 pounds per million British thermal units (lb/MMBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / (Q^{0.26}) = 0.27 \text{ lb/MMBtu heat input}$$

where Pt = rate of emission in pounds per MMBtu heat input.
Q = total source maximum operating capacity in MMBtu/hr
Q = (85+33.5+92.7+1.527) = 212.727 MMBtu/hr

D.2.2 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the 92.7 MMBtu/hr natural gas fired boiler (Boiler No. 5), and the 33.5 MMBtu/hr natural gas fired boiler (Boiler No. 3), when burning No. 2 distillate fuel oil, shall not exceed five-tenths (0.5) pounds per million Btu of heat input.

D.2.3 PSD Minor Modification Limit [326 IAC 2-2]

Pursuant to CP-163-8917-00022, issued on December 23, 1997, the input of No. 2 distillate fuel oil to the 33.5 MMBtu/hr boiler (Boiler No. 3) shall be limited to 1,100,000 gallons per 365 consecutive day period, rolled on a daily basis. This production limitation is equivalent to SO₂ emissions of 39 tons per 365 consecutive day period, rolled on a daily basis. Therefore, the PSD rules, 326 IAC 2-2, shall not apply.

During the first 365 days of operation, the No. 2 distillate fuel oil input shall be limited such that monthly fuel input to the 33.5 million Btu per hour boiler No. 3 shall not exceed 91,600 gallons.

D.2.4 New Source Performance Standard (NSPS) [326 IAC 12 and 40 CFR 60]

Pursuant to 326 IAC 12 and 40 CFR 60.40c through 60.48c, Subpart Dc, the owner or operator of the 33.5 MMBtu/hr boiler (Boiler No. 3) and the 92.7 MMBtu/hr boiler (Boiler No. 5) shall not discharge into the atmosphere:

- (a) SO₂ in excess of 0.5 pounds per million Btu heat input or, as an alternative, shall not combust in the boiler No. 2 distillate fuel oil that contains greater than 0.5 weight percent sulfur. If the owner or operator elects to demonstrate compliance with the sulfur content limit using fuel analysis, operation condition D.2.6 must be met;

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter or SO₂ limits specified in Conditions D.2.1, D.2.2 and D.2.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:
 - (1) Providing vendor analysis of fuel delivered, if accompanied by a certification; or
 - (2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (A) Oil samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the ninety-two and seven-tenths million British thermal units per hour (92.7 MMBtu/hr) heat input boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

D.2.7 NSPS Testing Requirement

Pursuant to the NSPS, Subpart Dc, a compliance opacity test shall be performed on the 33.5 million Btu per hour boiler No. 3 within 60 days after burning No. 2 fuel oil as the back-up fuel. This test shall be performed according to 326 IAC 3-2.1 (Source Sampling Procedures) using the methods specified in the rule. This performance test shall be conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.2.8 Visible Emissions Notations

- (a) Daily visible emission notations of the Boiler No. 3 and Boiler No. 5 stacks exhaust shall be performed during normal daylight operations when burning fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (6) below.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period; and

If the fuel supplier certification is used to demonstrate compliance, the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

- (b) Pursuant to 326 IAC 12, and 40 CFR 60.48c (g), the Permittee shall:
 - (A) maintain monthly records at the source of the following values in order to determine compliance with operation condition D.2.2:
 - (i) Total amount of No. 2 distillate fuel oil used;
 - (ii) Average sulfur content of No. 2 distillate fuel oil used;
 - (iii) Average higher heating value of the No. 2 distillate fuel oil used;
 - (iv) Average sulfur dioxide emission rate (expressed in pounds per million Btu).

Records of sulfur content and higher heating value can be determined by information as obtained by the vendor. As long as the certified vendor analysis indicates that the sulfur content is less than 0.5 percent and the higher heating value of the fuel oil delivered is greater than 140,000 Btu per gallon, the Permittee can note "less than 0.5 percent" and "greater than 140,000 Btu per gallon" for items (ii) and (iii) respectively.

- (B) maintain records at the source of the daily No. 2 distillate fuel oil usage in order to determine compliance with operation condition D.2.3.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.2.3, shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.
 - (i) For the first 365-day period, these reports shall include the calendar month No. 2 distillate fuel oil consumption.
 - (ii) For the succeeding 365-day periods, these reports shall include the following:
 - (A) Daily No. 2 distillate fuel oil consumption; and
 - (B) No. 2 distillate fuel oil consumption for previous 365-day period.
- (b) A summary to document compliance with operation condition D.2.2 shall be submitted upon request to the address listed in (a), within thirty (30) days after the day of the request. These reports shall include items (i) through (iv) of operation condition D.2.9(b).
- (c) Unless otherwise specified in this permit, any notice, report, or other submissions required by this permit shall be timely if:
 - (i) Postmarked on or before the date it is due; or
 - (ii) Delivered by any other method if it is received and stamped by IDEM, OAM, and Evansville EPA, on or before the date it is due.
- (d) All instances of deviations from any requirements of this permit must be clearly identified in such reports.
- (e) Any corrective actions taken as a result of an exceedance of a limit, an excursion from the parametric values, or a malfunction that may have caused excess emissions must be clearly identified in such reports.
- (f) The first report shall cover the periods commencing the postmarked submission date of the Affidavit of Construction.
- (g) The Permittee shall certify, on the form provided, that natural gas was fired in the boilers at all times during the report period. This certification shall be included when submitting the Annual Compliance Certification Letter.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) One (1) Black Paint System (metal parts are being coated), identified as EU2, with a maximum capacity of one-thousand one-hundred and seventy-eight units per hour (1,178 units/hr), using baffles as control (flow coat paint booth only) and exhausting to stacks S2-1 and S2-2.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the Black Paint System, identified as EU2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.3.2 Volatile Organic Compounds (VOC) [326 IAC 8]

Any change or modification to each facility that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter limits specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.5 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the baffles for PM control shall be in operation at all times when the Black Paint System is in operation.

D.3.6 Monitoring

- (a) Annual inspections shall be performed to verify the placement of the permanent baffles. To monitor the placement of the baffles, weekly observations shall be made of the overspray from the surface coating booth stacks while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of coating material on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a coating emission, evidence of coating emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step.

Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain a log of weekly, monthly and annual inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- One (1) Thermoplastic Liner System, identified as EU1, with a maximum usage of eleven-thousand pounds per hour (11,000 lb/hr) of raw material, and exhausting to stack S1-1. (1992)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Volatile Organic Compounds (VOC) [326 IAC 8]

Any change or modification to each facility that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirements

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- One (1) Expanded Polystyrene Process, identified as F12, with a maximum usage of five-hundred pounds per hour (500 lb/hr) of raw material, and exhausting to room. (1972)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8]

Any change or modification to each facility that would lead to an increase in volatile organic compound (VOC) emissions above twenty-five (25) tons per year, as specified in 326 IAC 2-1 must be approved by the Office of Air Management (OAM) before such change or modification can occur.

D.5.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the Expanded Polystyrene Process, identified as F12, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements applicable to this emission unit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

No record keeping or reporting is required.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- Miscellaneous VOC use (various VOC bearing lubricants, oils, and solvents), identified as F13, with a maximum usage of thirty-four (34) pounds per hour of VOC bearing material, and exhausting to the plant uncontrolled.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Emission Limitations and Standards

The use of various VOC bearing lubricants, oils, and solvents predates the October 7, 1974 applicability date for 326 IAC 8-6-1, Organic Solvent Emission Limitations. Therefore, there are no applicable emission limitations or standards. Any change or modification to existing facilities or addition of new facilities that would lead to an increase in volatile organic compound (VOC) emissions above exemption thresholds, as specified in 326 IAC 2-1 must be approved by the Office of Air Management before such change, modification or addition can occur.

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements applicable to this emission unit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

No record keeping or reporting is required.

- One (1) Natural Gas-fired boiler rated at 1.527 MMBtu/hr.

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.7.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-6865**

and

City of Evansville Environmental Protection Agency

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022

This form consists of 2 pages

Page 1 of 2

Check either No. 1 or No.2	
9 1.	This is an emergency as defined in 326 IAC 2-7-1(12)
C	The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C	The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2.	This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C	The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022

**This certification shall be included when submitting monitoring, testing reports/results
or other documents as required by this permit.**

Report period

Beginning: _____

Ending: _____

Boiler Affected

Alternate Fuel

Days burning alternate fuel

From

To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Quarterly Report

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022
Facility: Small Parts/Door Paint Line (EU3)
Parameter: Input VOCs from coatings and solvents
Limit: 33.5 tons per month

Quarter: _____ Year: _____

Month	Input VOCs employed by Small Parts/Door Paint Line (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Monthly Report

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022
Facility: 33.5 million Btu per hour boiler No. 3 (ID# EU-12)
Parameter: annual No. 2 distillate fuel oil consumption
Limit: 1,100,000 gallons (gals) per 365 consecutive day period rolled on a daily basis

Month: _____ Year: _____

Day	Daily Fuel Oil Usage (gals)	Fuel Oil Usage for Previous 365 Consecutive Day Period (gals)	Day	Daily Fuel Oil Usage (gals)	Fuel Oil Usage for Previous 365 Consecutive Day Period (gals)
1			17		
2			18		
3			19		
4			20		
5			21		
6			22		
7			23		
8			24		
9			25		
10			26		
11			27		
12			28		
13			29		
14			30		
15			31		
16					

Submitted by: _____
Title/Position: _____
Signature: _____
Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Quarterly Report

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022
Facility: 33.5 million Btu per hour boiler No. 3 (ID# EU-12)
Parameter: monthly distillate fuel oil consumption
Limit: 91,600 gallons (gals) per month for the first 365 consecutive day period after operation permit issuance (December 23, 1997).

Quarter: _____ Year: _____

Month	Monthly Fuel Oil Usage (gals)

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

**PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD:

Compliance Monitoring Requirement (e.g. Permit Condition D.1.7)	Number of Deviations	Date of each Deviations

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Management
and
City of Evansville Environmental Protection Agency**

**Technical Support Document (TSD) for a Part 70 Operating Permit
and Enhanced New Source Review (ENSR)**

Source Background and Description

Source Name:	Whirlpool Corporation
Source Location:	5401 U.S. 41 North, Evansville, Indiana 47727
County:	Vanderburgh County
SIC Code:	3632 and 3585
Operation Permit No.:	T163-7467-00022
Permit Reviewer:	KERAMIDA/RMEH

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Whirlpool Corporation relating to the manufacture of household refrigerators and ice making equipment.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) Small Parts/Door Paint Line (metal parts are being coated), identified as EU3, with a maximum capacity of seven-hundred and twenty-five units per hour (725 units/hr), using baffles and dry filters as control, and exhausting to stacks S3-1 through S3-10. This process consist of six (6) paint areas and one (1) paint bake oven rated at ten million British thermal units per hour (10 MMBtu/hr).
- (b) One (1) natural gas fired boiler (Boiler No. 2), identified as EU4, rated at eighty-five million British thermal units per hour (85 MMBtu/hr), and exhausting to stack S4.
- (c) One (1) natural gas fired boiler (Boiler No. 5) with the capability to burn No. 2 distillate fuel oil as back-up, identified as EU7, rated at ninety-two and seven tenths million British thermal units per hour (92.7 MMBtu/hr), and exhausting to stack S7.
- (d) One (1) natural gas fired boiler (Boiler No. 3) with the capability to burn No. 2 distillate fuel oil as back-up, identified as EU12, rated at thirty-three and five-tenths million British thermal units per hour (33.5 MMBtu/hr), and exhausting to stack S12.
- (e) One (1) Black Paint System (metal parts are being coated), identified as EU2, with a maximum capacity of one-thousand one-hundred and seventy-eight units per hour (1,178 units/hr), using baffles as control and exhausting to stacks S2-1 and S2-2.
- (f) One (1) Thermoplastic Liner System, identified as EU1, with a maximum usage of eleven-thousand pounds per hour (11,000 lb/hr) of raw material, using baffles as control and exhausting to stacks S1-1 and S1-2.
- (g) One (1) Expanded Polystyrene Process, identified as F12, with a maximum usage of five-hundred pounds per hour (500 lb/hr) of raw material, and exhausting to room.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

The application includes information relating to the construction and operation of the following equipment:

- One (1) 50 lb. Icemaker Foaming Line, identified as emission unit EU14, with a maximum capacity of producing twenty-eight (28) sets of Icemaker cabinets, lids, and doors per hour and exhausting to stack S14.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- 1) Space heaters, process heaters, or boilers using natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- 2) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.
- 3) VOC and HAP storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- 4) Machining where an aqueous cutting coolant continuously floods the machining interface.
- 5) Cleaners and solvents characterized as follows:
 - A) having a vapor pressure equal to or less than 2 kPa; 15 mm Hg; or 0.3 psi measured at 38 degrees C (100°F) or;
 - B) having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- 6) The following equipment related to manufacturing activities not resulting in the emission of HAPs; brazing equipment, cutting torches, soldering equipment, welding equipment.
- 7) Solvent recycling systems with batch capacity less than or equal to 100 gallons.
- 8) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- 9) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- 10) Paved and unpaved roads and parking lots with public access.
- 11) Enclosed systems for conveying plastic raw materials and plastic finished goods.

- 12) Asbestos abatement projects regulated by 326 IAC 14-10.
- 13) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- 14) On-site fire and emergency response training approved by the department.
- 15) Emergency generators as follows:
 - Diesel generators not exceeding 1600 horsepower.
 - Natural gas turbines or reciprocating engines not exceeding 16,000 horsepower.
- 16) Stationary fire pumps.
- 17) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- 18) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- 19) Other activities or categories not previously identified:
 - Pelletizer
 - Plastic Regrind Operations
 - Injection Molding
 - Four Touch-Up Spray Paint Booths
 - Solder Lines
 - Brazing Station
 - Pyrolysis Ovens (2)
 - Gas-Fired Dry Off Ovens
 - Three Fuel Oil Tanks (50,000 gallons each)
 - Resin Storage Silos
 - Resin Receivers
- 20) One (1) Master Batch Foam System, identified as EU8, with a maximum usage of twelve-thousand four-hundred eighty pounds per hour (12,480 lb/hr) of raw material combined, and exhausting to stacks S8-1 through S8-7.
- 21) One (1) Clamshell Foam In Place Door Press System, identified as EU9, with a maximum usage of eight-hundred pounds per hour (800 lb/hr) of raw material combined, and exhausting to stack # 132.
- 22) One (1) 12 and 27 Unit Cabinet Foam Lines, identified as EU10, with a maximum usage of nine-thousand three-hundred and sixty-one pounds per hour (9,361 lb/hr) of raw material combined, and exhausting to stacks S10-1 through S10-6.
- 23) One (1) Foam In Place Door Operation, identified as EU11, with a maximum usage of one-thousand two-hundred pounds per hour (1200 lb/hr) of raw material combined, and exhausting to stacks S11-1 through S11-4.
- 24) Four (4) Station FIP Door Press System, identified as emission unit EU13 (installed in March 1997), with a maximum capacity of twenty (20) door sets per hour and exhausting to stack #132 (S13).

Existing Approvals

The source has been operating under the following approvals:

- (1) 027-000-029, issued on March 9, 1992
- (2) 022-003-001, issued on March 9, 1992
- (3) 022-030-001, issued on October, 18, 1996
- (4) 022-005-030, issued on March 9, 1992
- (5) 022-005-021, issued on March 9, 1992
- (6) 022-003-002, issued on January 25, 1993
- (7) 022-003-005, issued on March 9, 1992
- (8) 022-005-032, issued on October 13, 1992
- (9) I-MOD-022-003-002, issued on February 28, 1997
- (10) CP-163-8917-00022, issued on December 23, 1997

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no Enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 11, 1996. Additional information was received on February 6, 1998.

A notice of completeness letter was mailed to the source on December 19, 1996.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.”

Pollutant	Potential Emissions (tons/year)
PM-10	less than 100
SO ₂	greater than 250
VOC	greater than 250
CO	less than 100
NO _x	greater than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Lead	less than 10
Other HAPs	less than 10 each
TOTAL	less than 25

- (a) The potential emissions (as defined in the Indiana Rule) of SO₂, VOC and NO_x are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Fugitive Emissions
 Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1996 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.036
PM-10	0.036
SO ₂	0.0108
VOC	619.542
CO	4.41
NO _x	18.62
HAP (lead)	< 1

Limited Potential to Emit

The table below summarizes the total limited potential to emit of the significant emission units.

	Limited Potential to Emit						
Process/ facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Small Parts / Door Paint Line (EU3) 022-030-001, issued 10/18/96	-	-	-	33.5 ^(a) tons/month	-	-	-
New natural gas fired boiler (Boiler No. 3), rated at 33.5 MMBtu/hr	-	-	39 ^(b) tons/year	-	-	-	-
other emission units	-	-	-	-	-	-	-

- (a) This limit will result in a net increase of emissions of less than 40 tons per year, making this a minor modification to a PSD major source.
- (b) This limit will make this a minor modification to a PSD major source.

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment/Unclassifiable
Lead	Not Designated

Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as attainment for ozone.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

- (1) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (2) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

- (a) The natural gas fired Boiler (Boiler No. 3) when using No. 2 distillate fuel oil as backup fuel, identified as EU12, constructed in 1997 is subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR 60.40c through 60.48c, Subpart Dc. This rule requires that the owner or operator of the 33.5 million Btu per hour Boiler No. 3 shall not discharge into the atmosphere:
 - (i) SO₂ in excess of 0.5 pounds per million Btu heat input when burning No. 2 distillate fuel oil or, as an alternative, shall not combust in the Boiler No. 2 distillate fuel oil that contains greater than 0.5 weight percent sulfur.
- (b) The natural gas fired Boilers No. 2 and No. 5, identified as EU4 and EU7 are not subject to the New Source Performance Standard, 326 IAC 12 and 40 CFR 60.40c through 60.48c, Subpart Dc because these two Boilers were installed before June 9, 1989.
- (c) The Small Parts/Door Paint Line, identified as EU3 is subject to 326 IAC 8-2-7 and 40 CFR Part 60.452, Subpart SS (Surface Coating - Large Appliances). The volatile organic compound (VOC) content of coatings applied to refrigerators, freezers, etc., from the Small Parts/Door Paint Line, identified as EU3, shall be limited to 0.34 kilogram per liter of coating (2.8 pounds VOC per gallon) delivered to the applicator less water. Compliance with this condition will also satisfy the VOC emissions requirements under 40 CFR Part 60.452, Subpart SS. See Appendix A for detailed calculations.

The use of quick-drying lacquers used for repair of scratches and nicks are exempt from the above limit but shall be limited to one (1) gallon usage per eight (8) hour period.
- (d) The Small Parts/Door Paint Line, identified as EU3 is subject to 326 IAC 2-2 and 40 CFR 52.21 (PSD Minor Limit). The input VOC's delivered to the applicators of the Small Parts/Door Paint Line (EU3) shall be limited to 33.5 tons of VOC per month. This will result in a net increase in VOC emissions of less than 40 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.
- (e) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63 applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21, this source is a major source.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of PM₁₀, SO₂, NO_x, VOC, and CO. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-3 (Emission Offset Minor Modification Limit)

Pursuant to CP-163-8917-00022, issued on December 23, 1997, the input of No. 2 distillate fuel oil to the 33.5 million Btu per hour Boiler No. 3 (identified as EU12) shall be limited to 1,100,000 gallons per 365 consecutive day period, rolled on a daily basis. This production limitation is equivalent to SO₂ emissions of 39 tons per 365 consecutive day period, rolled on a daily basis. Therefore, the Emission Offset rules, 326 IAC 2-3, shall not apply.

During the first 365 days of operation, the No. 2 distillate fuel oil input shall be limited such that monthly fuel input to the 33.5 million Btu per hour Boiler No. 3 shall not exceed 91,600 gallons.

326 IAC 6-1 (Nonattainment Area Particulate Limitations)

The Black Paint System (EU2), the Small Parts/Door Paint Line (EU3), and the Thermoplastic Liner System (EU1), are not subject to 326 IAC 6-1 because their potentials to emit and the source potential to emit particulate are less than 100 tons per year and their particulate actual emissions are less than 10 tons per year.

The natural gas fired boiler (Boiler No. 2), identified as EU4, the natural gas fired boiler (Boiler No. 5) with the capability to burn No. 2 distillate fuel oil as back-up, identified as EU7, and the natural gas fired boiler (Boiler No. 3) with the capability to burn No. 2 distillate fuel oil as back-up, identified as EU12, are not subject to 326 IAC 6-1-16 (Nonattainment Area Particulate Limitations: Vanderburgh County), because these boilers are not longer using coal or No. 6 oil. These boilers are limited to use only natural gas or No. 2 distillate fuel oil as back-up.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (PM Emission Limitations) the allowable PM emission rate from the 85 million Btu per hour Boiler No. 2 (Unit EU4), the 33.5 million Btu per hour Boiler No. 3 (Unit EU12), and the 92.7 million Btu per hour Boiler No. 5 (Unit EU7) and the 1.527 million Btu per hour boiler (Insignificant) shall not exceed twenty-seven hundredths 0.27 pounds per million British thermal units (lb/MMBtu).

This limitation is based on the following equation:

$$Pt = 1.09 / (Q^{0.26}) = 0.27 \text{ lb/MMBtu heat input}$$

where Pt = rate of emission in pounds per MMBtu heat input.
Q = total source maximum operating capacity in MMBtu/hr
Q = (85+33.5+92.7+1.527) = 212.727 MMBtu/hr

326 IAC 6-3-2(c) (Particulate Matter (PM))

Pursuant to 326 IAC 6-3-2(c), the Black Paint System (EU2), the Small Parts/Door Paint Line (EU3), the Thermoplastic Liner System (EU1), the Expanded Polystyrene Process (F12), and the 50 lb Icemaker Foaming Line (EU14) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

326 IAC 7-1.1-1 (SO₂ Emissions Limitations)

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) the SO₂ emissions from the 85 million Btu per hour Boiler No. 2 (Unit EU4), the 33.5 million Btu per hour Boiler No. 3 (Unit EU12), and the 92.7 million Btu per hour Boiler No. 5 (Unit EU7) shall not exceed five-tenths (0.5) pounds per million Btu of heat input.

326 IAC 8 (Volatile Organic Compound Rules)

The Expanded Polystyrene Process (F12) is not subject to any VOC rule because this emission unit was installed in 1972.

326 IAC 8-1-6 (General Provisions relating to VOC Rules)

The Thermoplastic Liner System (EU1) and the 50 lb Ice maker Foaming Line (EU14) are not subject to 326 IAC 8-1-6 because each of their potential emissions are below 25 tons VOC per year.

326 IAC 8-2-7 (Large Appliances Coating Operations)

The Small Parts/Door Paint Line, identified as EU3 is subject to 326 IAC 8-2-7 and 40 CFR Part 60.452, Subpart SS (Surface Coating - Large Appliances). The volatile organic compound (VOC) content of coatings applied to refrigerators, freezers, etc., from the Small Parts/Door Paint Line, identified as EU3, shall be limited to 0.34 kilogram per liter of coating (2.8 pounds VOC per gallon) delivered to the applicator less water. Compliance with this condition will also satisfy the VOC emissions requirements under 40 CFR Part 60.452, Subpart SS. The use of quick-drying lacquers used for repair of scratches and nicks are exempt from the above limit but shall be limited to one (1) gallon usage per eight (8) hour period.

The Black Paint System, identified as EU2, is not subject to 326 IAC 8-2-7, because this emission unit is involved with the painting of condensers.

326 IAC 8-2-9 (Surface Coating Emission Limitations: miscellaneous metal coating operations)

The Black Paint System (metal parts are being coated), identified as EU2, is not subject to 326 IAC 8-2-9, because this emission unit was installed pre-1970 and is located in Vanderburgh County.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in permit Section D are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in permit Section D. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action.

However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

The Small Parts/Door Paint Line and Black Paint System, identified as EU3 and EU2, have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the Small Parts/Door Paint Line and Black Paint System, identified as EU3 and EU2, must operate properly to ensure compliance with 326 IAC 6-3-2(c) and 326 IAC 2-7 (Part 70).

The Boiler No. 3 and Boiler No. 5, identified as EU7 and EU12, have applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the Boiler No. 3 and Boiler No. 5 stacks exhaust shall be performed during normal daylight operations when burning fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the Boiler No. 3 and Boiler No. 5, identified as EU7 and EU12, must operate properly to ensure compliance with 326 IAC 6-2-4 (PM Emission Limitations for Sources of Indirect Heating that were constructed after September 21, 1983) and 326 IAC 2-7 (Part 70).

The Thermoplastic Liner System, EU1, has applicable compliance monitoring conditions as specified below:

- (a) Daily visible emission notations of the Thermoplastic Liner System stacks exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the Thermoplastic Liner System must operate properly to ensure compliance with 326 IAC 6-3-2 (Process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

- (a) This source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Amendments to the Clean Air Act.
- (b) See attached calculations for detailed air toxic calculations.

Conclusion

The operation of this household refrigerator and ice making equipment manufacturing plant shall be subject to the conditions of the attached proposed Part 70 Permit No. T163-7467-00022.

Indiana Department of Environmental Management Office of Air Management

Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Whirlpool Corporation
 Source Location: 5401 U. S. 41 North, Evansville, Indiana, 47727
 County: Vanderburgh
 SIC Code: 3632 and 3585
 Operation Permit No.: T163-7467-00022
 Permit Reviewer: KERAMIDA/RMEH

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the Evansville Courier, Evansville, Indiana, stating that Whirlpool Corporation had applied for a Part 70 Operating Permit to operate a stationary source that produces household refrigerators and ice makers. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAM has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted).

1. Condition B.27, Credible Evidence

IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana's statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 — Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to establish compliance or noncompliance.~~

2. The last sentence of Condition C.3, has been deleted and the condition has been revised to reflect current rule language. The condition has been changed to:

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (~~Visible Emissions~~ **Opacity** Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), ~~visible emissions opacity~~ shall meet the following, unless otherwise stated in this permit:

- (a) ~~Visible emissions~~ **Opacity** shall not exceed an average of thirty percent (30%) ~~opacity~~ in ~~twenty-four (24) consecutive readings~~, **any one (1) six (6) minute averaging period** as determined in 326 IAC 5-1-4.

- (b) ~~Visible emissions~~ **Opacity** shall not exceed sixty percent (60%) ~~opacity~~ for more than a cumulative total of fifteen (15) minutes (sixty (60) readings **as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor**) in a six (6) hour period.
3. Section D.1.9 (Monitoring) has been revised as follows.
- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks (S3-1 through S3-10) while the booth is in operation. **During periods of inclement weather, observations will be performed weather permitting.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
4. Section D.1.10 (Record Keeping Requirements) has been revised as follows.
- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily, ~~and~~ weekly, **and monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
5. Section D.2.1 (Particulate Matter) has been revised as follows:
- D.2.1 Particulate Matter (PM) [326 IAC 6-2-4]
-
- Pursuant to 326 IAC 6-2-4 (PM Emission Limitations for Sources of Indirect Heating that were constructed after September 21, 1983) the allowable PM emission rate from the 85 MMBtu/hr boiler (Boiler No. 2), the 92.7 MMBtu/hr boiler (Boiler No. 5), the 33.5 million Btu per hour boiler (Boiler No. 3), shall not exceed twenty-seven hundredths 0.27 pounds per million British thermal units (lb/MMBtu).
- This limitation is based on the following equation:**
- $$Pt = 1.09 / (Q^{0.26}) = 0.27 \text{ lb/MMBtu heat input}$$
- where Pt = rate of emission in pounds per MMBtu heat input.**
Q = total source maximum operating capacity in MMBtu/hr
Q = (85+33.5+92.7+1.527) = 212.727 MMBtu/hr
5. Section D.2.4 (New Source Performance Standard) has been revised as follows to reflect that Boiler No. 5 is subject to 40 CFR 60 Subpart Dc:

6. Section D.3.6 (Monitoring) has been revised as follows.

- (a) ~~Daily~~ **Annual** inspections shall be performed to verify the placement of the **permanent** baffles. To monitor the placement of the baffles, ~~daily~~ **weekly** observations shall be made **of the overspray from the surface coating booth stacks** while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stacks and the presence of coating material on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a coating emission, evidence of coating emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The roof top inspections are used, as a supplement to visible emission notations, to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if evidence of overspray emission is observed, to ensure continuous compliance with emission limitations. OAM does not believe that annual inspection is adequate to indicate compliance with 326 IAC 5-1 and 326 IAC 6. Annual inspections were specified for the baffles because these are permanent, static features in the ductwork and would not be expected to become moved out of place.

7. Section D.3.7 (Record Keeping Requirements) has been revised as follows.

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain a log of ~~daily overspray observations,~~ and weekly, **monthly, and annual** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

8. Section D.6.1 (Emission Limitations and Standards) has been revised as follows. Due to this change, the subsequent condition has been renumbered.

D.6.1 Emission Limitations and Standards

The use of various VOC bearing lubricants, oils, and solvents predates the October 7, 1974 applicability date for 326 IAC 8-6-1, Organic Solvent Emission Limitations. Therefore, there are no applicable emission limitations or standards. Any change or modification to existing facilities or addition of new facilities that would lead to an increase in volatile organic compound (VOC) emissions above exemption thresholds, as specified in 326 IAC 2-1 must be approved by the Office of Air Management before such change, modification or addition can occur.

9. The following reporting form has been added to the permit for the input VOC report required at D.1.11, Reporting Requirements.

**OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
AND
CITY OF EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY**

Part 70 Quarterly Report

Source Name: Whirlpool Corporation
Source Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Mailing Address: 5401 U.S. 41 North, Evansville, Indiana 47727
Part 70 Permit No.: T163-7467-00022
Facility: Small Parts/Door Paint Line (EU3)
Parameter: input VOCs from coatings and solvents
Limit: 33.5 tons per month

Quarter: _____ Year: _____

Month	Input VOCs employed by Small Parts/Door Paint Line (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

COMMENTS FROM WHIRLPOOL CORPORATION

On November 24, 1998, Whirlpool Corporation submitted comments on the proposed Part 70 permit.

The comments are the following:

Whirlpool Corporation, Evansville Division, (Whirlpool) respectfully submits the following comments on the above referenced permit and associated technical support document. The comments provided herein follow the same general order as the issues discussed appear in the draft documents. Where appropriate we have included suggested wording changes that are noted in bold underlined font. Suggested word deletions are identified with strike through notations.

Comment 1:

The Black Paint System is correctly identified in the body of the permit as a source of particulate matter (PM) and volatile organic compound (VOC) emissions. The 50 lb Icemaker Foaming Line is a source of ozone depleting substance (ODS) emissions only. It is not a source of PM or VOC emissions and should not be grouped with nor regulated the same as the Black Paint System. The 50 lb Icemaker Foaming Line should be regulated in a manner similar to all other ODS emission sources identified in the draft permit; please refer to Insignificant Activities No. 20 through 24, Technical Support Document page 3 of 11). Please make the following revision.

D.3 FACILITY OPERATION CONDITIONS

- One (1) Black Paint System (metal parts are being coated), identified as EU2 and ~~One (1) 50 lb Icemaker Foaming Line, identified as EU14.~~

Response 1:

The 50 lb Icemaker Foaming Line, identified as EU14, has been deleted from Section D.3. It will be considered an insignificant activity with no applicable regulations.

Comment 2:

Whirlpool is a major stationary source for hazardous air pollutants (HAPs). Please make the following revision.

A.1 General Information

The Permittee owns and operates ...

...

Source Status: Part 70 Permit Program

Major Source, under PSD

~~Minor~~ **Major** Source, Section 112 of the Clean Air Act

Response 2:

This change has been made.

Comment 3:

Baffles are installed in the ductwork to control paint entrainment from the flow coat booth only. The oven associated with this paint line does not include baffles. Please make the following revision.

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists ...

...

- (e) One (1) Black Paint System (metal parts are being coated), identified as EU2, with a maximum capacity of one-thousand one-hundred and seventy-eight units per hour (1,178 units/hr), using baffles as control **(flow coat paint booth only)** and exhausting to stacks S2-1 and S2-2.

Response 3:

This change has been made.

Comment 4:

This emission unit and any associated exhaust duct work is not equipped with baffles for PM control. The only air discharge from this emission unit (stack S1-1) is from the extrusion system. Emission point S1-1 was erroneously depicted on the process flow diagram provided in the Part 70 permit application as a discharge of a vacuum pump water seal to the plant sewer. Please make the following revision.

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source consists ...

- (f) One (1) Thermoplastic Liner System, identified as EU1, with a maximum usage of eleven-thousand pounds per hour (11,000 lbs/hr) of raw material, ~~using baffles as control~~ and exhausting to stacks S1-1 and S1-2.

Response 4:

This change has been made.

Comment 5:

Whirlpool is adjacent to and shares a property boundary with the Evansville-Vanderburgh County Regional Airport. As such Whirlpool is prohibited by FAA rules to construct stacks that would otherwise interfere with the safe operation of the airport's runway system. The suggested word addition is made in order to clarify Whirlpool's obligation for affected stacks. Please make the following revision.

C.8 Stack Height

Unless prohibited by applicable Federal Aviation Administration (FAA) rules or other State or federal rules pertaining to height limitations for structures adjacent to or near airport runways,

~~The~~ Permittee shall comply with the provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

Response 5:

This change has been made.

Comment 6:

Whirlpool recommends the deletion of this condition from the permit. The requirements applicable to asbestos abatement projects are clearly specified in 326 IAC 14-10 and 40 CFR 61.140. The inclusion of these requirements within the permit is redundant. Please make the following revision.

~~C.9 Asbestos Abatement Projects~~

Response 6:

Renovation is defined in 326 IAC 14-10-2 (38) as altering a facility or a component of a facility in any way. All areas where renovation or demolition are going to occur must be inspected by an accredited asbestos inspector.

The language in the permit is the same as the Federal language found in 40 CFR 61, Subpart M. Not every renovation must be reported. If the Permittee's renovation will involve stripping, removing or disturbing two hundred sixty (260) linear feet on pipes, one hundred sixty (160) square feet on other facility components; or a total of thirty-five feet (35) cubic feet on all facility components or more of friable asbestos, then the Permittee must notify IDEM using an IDEM notification form at least ten (10) working prior to renovation.

Demolition is defined as removing supporting beams, walls or structures of a facility. 326 IAC 14-10-1(a)(1) states that the Permittee must properly notify IDEM of every demolition project, even if no asbestos is present. There have been no changes resulting from this comment.

Comment 7:

Whirlpool has previously submitted ERPs to IDEM and Evansville EPA pursuant to 326 IAC 1-5-2. The suggested wording changes clarify this point. Please make the following revision.

C.14 Emergency Reduction Plans
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

The Permittee ~~shall~~ **has** prepared d written emergency reduction plans (ERPs) consistent with safe operating procedures.

These ERPs ~~shall be~~ **have been** submitted for approval to:

Indiana Department of Environmental Management
...
and
City of Evansville Environmental Protection Agency
...

~~within ninety (90) days after the date of issuance of this permit.~~

(c)-(f) [no changes proposed]

Response 7:

The following changes have been made.

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee ~~shall prepare~~ **prepared and submitted** written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) ~~These ERPs shall be submitted for approval to:~~

~~Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
400 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015~~

~~and~~

~~City of Evansville Environmental Protection Agency
Room 250
401 N. W. Martin Luther King Jr. Blvd.
Evansville, Indiana 47708~~

~~within ninety (90) days after the date of issuance of this permit.~~

~~The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

~~(e)~~**(b)** If the ERP is disapproved by IDEM, OAM, and the City of Evansville Environmental Protection Agency, the Permittee shall have an additional thirty (30) days to resolve the differences and

submit an approvable ERP.

- (d)(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e)(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f)(e) Upon direct notification by IDEM, OAM, and the City of Evansville Environmental Protection Agency, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

Comment 8:

Whirlpool recommends the deletion of this condition from the permit. The requirements applicable to affected operations involving stratospheric ozone depleting substances are clearly specified in 326 IAC 22-1 and 40 CFR Part 82. The inclusion of these requirements within the permit is redundant. Please make the following revision.

Stratospheric Ozone Protection

~~G.22 Compliance with 40 CFR 82 and 326 IAC 22-1~~

Response 8:

40 CFR 82 regulates the handling of ozone-depleting substances such as Freon in a variety of processes and products including domestic and commercial refrigeration and air-conditioning units and portable fire extinguishers. Most sources include one or more subject units. Maintenance or repair of such units has the potential to release substances controlled under these rules. The condition remains unchanged.

Comment 9:

The proposed revisions will make this condition consistent with the requirements of IDEM Construction Permit CP 163-4980, Certificate of Operation #022-030-001, and Condition D.1.8. Please make the following revision.

D.1.4 PSD Minor Limit

Pursuant to Certificate of Operation #022-030-001, issued on October 18, 1996, the input VOC's **from all coatings and solvents delivered to the applicators of employed by** the Small Parts/Door Paint Line (EU3) shall be less than 33.5 tons of VOC per month ... [no further changes proposed].

Response 9:

This change has been made.

Comment 10:

Particulate matter (PM) from paint overspray is controlled by a combination of baffles followed in series by dry filters. Baffles serve as the primary means of PM control. Whirlpool proposes to use existing instrumentation that monitors the pressure drop across the secondary dry filter systems operated on each painting zone of the booth. Whirlpool proposes that monitoring the differential pressure on a daily basis is a more accurate means of assessing baffle/dry filter performance than daily stack observations. Please make the following revision.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity, and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the ~~overspray from the surface coating booth stacks (S3-1 through S3-10)~~ **differential**

pressure gauges installed in each painting zone while the booth is in operation ... [no further changes to D.1.9 (a) proposed].

Response 10:

The visible emission notations are used to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if visible emissions are abnormal, to ensure continuous compliance with emission limitations. OAM does not believe that differential pressure gauge observation is adequate to indicate compliance with 326 IAC 5-1 and 326 IAC 6.

Comment 11:

Whirlpool proposes less frequent roof-top inspections. Whirlpool contends that the daily differential pressure readings eliminate the need to conduct the inspections more often than annually. Please make the following revision to Condition D.1.9.

- (b) ~~Weekly~~ **Annual** inspections shall be ... [no further changes to D.1.9(b) proposed].

Response 11:

The roof top inspections are used, as a supplement to visible emission notations, to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if evidence of overspray emission is observed, to ensure continuous compliance with emission limitations. OAM does not believe that annual inspection is adequate to indicate compliance with 326 IAC 5-1 and 326 IAC 6. Upon further review, the OAM has decided to make the following revisions to the permit.

D.1.9 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, ~~daily~~ **weekly** observations shall be made of the overspray from the surface coating booth stacks (1,2,3,4,5,7,8) while one or more of the booths are in operation. **During periods of inclement weather, observations will be performed weather permitting.** The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly~~ **Monthly** inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Comment 12:

Whirlpool currently maintains monthly records of actual coating and solvent usage in accordance with IDEM Construction Permit CP 163-4980 and Certificate of Operation #022-030-001. Records such as purchase orders and invoices are redundant and unnecessary. Further, these types of records do not accurately depict the actual operation of this emission unit. Please make the following revision.

D.1.10 Record Keeping Requirements

- (a) To document compliance with ...
- (1) The amount and VOC content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.~~

Response 12:

The condition has been changed.

Comment 13:

The proposed wording changes are consistent with comments offered above for Condition D.1.9. Please make the following revision.

D.1.10 Record Keeping Requirements

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of daily overspray observations **differential pressure readings**, ~~daily and weekly~~ **annual** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Response 13:

The following changes have been made to Condition D.1.10.

- (b) To document compliance with Condition D.1.9, the Permittee shall maintain a log of ~~daily~~ **weekly** overspray observations, daily, ~~and~~ weekly, **and monthly** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 14:

Whirlpool currently submits quarterly reports of the data cited in accordance with IDEM Construction Permit CP 163-4980 and Certificate of Operation #022-030-001. Whirlpool proposes the revision to be consistent with the existing requirements for this emission unit. Please make the following revision.

D.1.11 Reporting Requirements

A ~~monthly~~ **quarterly** summary of the information to document compliance with Conditions D.1.2, D.1.3, and D.1.4 shall be submitted to the addressees listed in Section C – General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent.

Response 14:

This change has been made.

Comment 15:

CP-163-8917-00022 was issued as a synthetic minor modification with limited sulfur dioxide (SO₂) emissions. Vanderburgh County is designated as attainment for SO₂. The correct major new source review rule citation is the Prevention of Significant Deterioration (PSD) rules and not the Emission Offset rules. Please make the following revision.

D.2.3 ~~Emission Offset~~ PSD Minor Modification Limit [326 IAC 2-3 ~~2-2~~]

Pursuant to CP-163-8917-00022, issued on December 23, 1997, ... rolled on a daily basis. Therefore, the ~~Emission Offset~~ **PSD** rules, 326 IAC 2-3 ~~2-2~~, shall not apply. [no further changes proposed]

Response 15:

This change has been made.

Comment 16:

The proposed change contains the proper condition reference. Please make the following revision.

D.2.4 New Source Performance Standard (NSPS)

Pursuant to 326 IAC 12 and 40 CFR 60.40c through 60.48c, Subpart Dc, the owner ...

- (a) SO₂ in excess of 0.5 pounds per million Btu heat input or, as an alternative, shall not combust in the boiler No. 2 distillate fuel oil that contains greater than 0.5 weight percent sulfur. If the owner or operator elects to demonstrate compliance with the sulfur content limit using fuel analysis, operation condition ~~D-2-8~~ **D.2.6** must be met.

Response 16:

This change has been made.

Comment 17:

The proposed changes to Sections (a) and (a)(1) clarify Whirlpool's obligations under this Condition.

As originally drafted, the final sentence of this Condition suggests a form of double-jeopardy with respect to demonstrating compliance with the applicable fuel oil sulfur content and associated SO₂ emission limit. According to EPA policy and the Indiana State Implementation Plan (SIP) the use of either fuel oil sampling and analysis or emissions testing is equally acceptable as the means of demonstrating compliance with an applicable SO₂ emission limit. The draft condition language cited above does not reflect this regulatory premise in any way. The deletion of this sentence will relieve Whirlpool of undue liability and make this Condition consistent with the Indiana SIP. Please make the following revision.

D.2.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance shall be determined ~~utilizing one of the following options~~ **pursuant to the methods specified in (a) or (b) given below.**

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five tenths percent (0.5%) by weight by:

Providing vendor analysis of fuel delivered, if accompanied by a certification; **or**

[no further changes proposed]

- (b) [no changes proposed]

~~A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.~~

Response 17:

The following change has been made to Condition D.2.6.

Compliance shall be determined utilizing one of the following options.

- (a) Pursuant to 326 IAC 3-7-4, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed five-tenths percent (0.5%) by weight by:

(1) Providing vendor analysis of fuel delivered, if accompanied by a certification; **or**

(2) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.

- (A) Oil samples ~~may~~ **shall** be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (B) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling; or
- (b) Compliance may also be determined by conducting a stack test for sulfur dioxide emissions from the ninety-two and seven-tenths million British thermal units per hour (92.7 MMBtu/hr) heat input boiler, using 40 CFR 60, Appendix A, Method 6 in accordance with the procedures in 326 IAC 3-6.

A determination of noncompliance pursuant to either of the methods specified in (a) or (b) above shall not be refuted by evidence of compliance pursuant to the other method.

The final statement, "A determination of noncompliance pursuant to ...", cannot be deleted. Removal of this statement would constitute would conflict with OAM's right to request verification of a compliance certification by requesting certification by one of the other methods.

Comment 18:

Whirlpool proposes to delete Condition D.2.8 as it is redundant with Condition D.2.6. Please make the following revision.

~~D.2.8 — No. 2 Distillate Fuel Oil Sampling and Analysis~~

Response 18:

Condition D.2.8 has been deleted. Due to this deletion, subsequent conditions have been renumbered.

Comment 19:

Whirlpool requests that Condition D.2.9 be deleted from the permit altogether. The compliance monitoring methods listed in this condition are not supported by a standard EPA Reference Method. As such, the monitoring results and any statement of compliance derived from them would be arbitrary and subject to wide interpretation. Whirlpool is unwilling to accept this liability. Please make the following revision.

~~D.2.9 — Visible Emissions Notations~~

Response 19:

The requirement of performing daily visible emission notations when a boiler is burning fuel oil is used to indicate that the source is in compliance with 326 IAC 5-1 and 326 IAC 6, and to indicate to the source whether or not a problem exists in the operation. The natural gas certification is used in lieu of daily visible emissions notations, for when the boilers are burning natural gas. No changes have been made to the wording of Condition D.2.9 Visible Emissions Notations.

Comment 20:

The Black Paint System is correctly identified in the body of the permit as a source of particulate matter (PM) and volatile organic compound (VOC) emissions. The 50 lb Icemaker Foaming Line is a source of ozone depleting substance (ODS) emissions only. It is not a source of PM or VOC emissions and should not be grouped with nor regulated the same as the Black Paint System. The 50 lb Icemaker Foaming Line should be regulated in a manner similar to all other ODS emission sources identified in the draft permit; please refer to Insignificant Activities No. 20 through 24, Technical Support Document page 3 of 11). Please make the following revision.

Section D.3
Facility Description

- (1) One (1) Black Paint System (metal parts are being coated), identified as EU2, with a maximum capacity of one-thousand one-hundred and seventy-eight units per hour (1,178 units/hr), using baffles as control **(flow coat paint booth only)** and exhausting to stacks S2-1 and S2-2.
- (2) ~~One (1) 50 lb. Icemaker Foaming Line, identified as emission unit EU14, with a maximum capacity of producing twenty-eight (28) sets of icemaker cabinets, lids, and doors per hour and exhausting to stack S14.~~

Response 20:

This change has been made. The 50 lb Icemaker Foaming Line, identified as EU14 will be considered an insignificant activity with no applicable regulations.

Comment 21:

Please refer to Comment 20. Please make the following revision.

D.3.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2(c), the PM from the Black Paint System ~~and the 50 lb Icemaker Foaming Line, identified as EU2 and EU14~~, shall not exceed ... [no further changes to D.3.1 proposed]

Response 21:

This change has been made.

Comment 22:

The baffles located in the ductwork from the flowcoat paint booth are permanent static fixtures and do not require inspection at a more frequent basis than annually. Please make the following revision.

D.3.6 Monitoring

- (a) ~~Daily Annual~~ inspections shall be performed to verify the placement of the baffles. To monitor the baffles, ~~daily observations~~ **an annual inspection** shall be made while the booth is in operation. [no further changes to D.3.6(a) proposed]

Response 22:

The roof top inspections are used, as a supplement to visible emission notations, to indicate compliance with 326 IAC 5-1 and 326 IAC 6, without the requirement to have a person on site trained in opacity measurement. This requirement is designed as a trigger that the source perform some corrective action on the facility if evidence of overspray emission is observed, to ensure continuous compliance with emission limitations. OAM does not believe that annual rooftop inspection is adequate to indicate compliance with 326 IAC 5-1 and 326 IAC 6. Annual inspections were specified for the baffles because these are permanent, static features in the ductwork and would not be expected to become moved out of place. Section D.3.6 (Monitoring) has been revised as follows.

- (a) ~~Daily Annual~~ inspections shall be performed to verify the placement of the **permanent** baffles. To monitor the placement of the baffles, ~~daily weekly~~ observations shall be made **of the overspray from the surface coating booth stacks** while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) ~~Weekly Monthly~~ inspections shall be performed of the coating emissions from the stacks and the presence of coating material on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a coating emission, evidence of coating emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response

step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 23:

Whirlpool proposes less frequent roof-top inspections. Please make the following revision to Condition D.3.6.

- (b) ~~Weekly~~ **Annual** inspections shall be ... [no further changes to D.3.6(b) proposed].

Response 23:

Please refer to Response 22.

Comment 24:

The proposed wording changes are consistent with comments offered above for Condition D.3.6, Comment 22. Please make the following revision.

D.3.7 Record Keeping Requirements

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain a log of ~~daily overspray observations, daily and weekly~~ **annual** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Response 24:

Section D.3.7 (Record Keeping Requirements) has been revised as follows.

- (a) To document compliance with Condition D.3.6, the Permittee shall maintain a log of ~~daily overspray observations, and weekly,~~ **monthly, and annual** inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

Comment 25:

This emission unit and any associated exhaust duct work is not equipped with baffles for PM control. The only air discharge from this emission unit (stack S1-1) is from the extrusion system. Emission point S1-1 was erroneously depicted on the process flow diagram provided in the Part 70 permit application as a discharge of a vacuum pump water seal to the plant sewer. Please make the following revision.

Section D.4

Facility Description

One (1) Thermoplastic Liner System, identified as EU1, with a maximum usage of eleven-thousand pounds per hour (11,000 lbs/hr) of raw material, ~~using baffles as control~~ and exhausting to stacks S1-1 ~~and S1-2~~.

Response 25:

This change has been made.

Comment 26:

The thermoplastic liner system as defined by this draft Part 70 permit includes the extrusion process only. The extrusion process is not a source of PM emissions, therefore, 326 IAC 6-3 is not applicable and this condition should be deleted. Please make the following revision.

~~D.4.1~~ ~~Particulate Matter (PM)~~

Monitoring requirements do not apply as the emission unit does not employ equipment to capture and control PM emissions. There are no compliance monitoring requirements applicable to this emission unit. Please make the following revision.

Compliance Monitoring Requirements

~~D.4.4 — Particulate Matter (PM)~~

~~D.4.5 — Monitoring~~

Record keeping and reporting requirements do not apply as the emission unit does not have any applicable monitoring requirements. No record keeping or reporting is required. Please make the following revision.

Record Keeping and Reporting Requirements

~~D.4.6 — Record Keeping Requirements~~

Response 26:

Conditions D.4.1, D.4.4, D.4.5 and D.4.6 have been deleted. Due to these deletions, subsequent conditions have been renumbered.

Comment 27:

Whirlpool proposes to delete this report from the permit. The information provided by this report is redundant with information provided by the reports provided on pages 48 of 50 and 49 of 50. Please make the following revision.

~~PART 70 OPERATING PERMIT, NATURAL GAS FIRED BOILER CERTIFICATION~~

Response 27:

The Natural Gas Fired Boiler Certification is required to indicate compliance with 326 IAC 5-1 when the boiler is burning natural gas for fuel. This Certification has not been changed.

Comment 28:

Whirlpool included Emission Unit F13 as a significant emission unit in its Part 70 permit application. Emission Unit F13 was identified in the application to represent miscellaneous VOC/solvent usage; activities grouped under Emission Unit F13 included uses such as hydraulic stamping press lubricants and vanishing oils. Whirlpool requests an explanation of the reasons that this emission unit was omitted from the draft Part 70 permit.

Response 28:

The omission of Emission Unit F13 was an oversight. The following changes were made in order to add Emission Unit F13 to the permit.

SECTION D.6

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- Miscellaneous VOC use (various VOC bearing lubricants, oils, and solvents), identified as F13, with a maximum usage of thirty-four (34) pounds per hour of VOC bearing material, and exhausting to the plant uncontrolled.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Emission Limitations and Standards

The use of various VOC bearing lubricants, oils, and solvents predates the October 7, 1974 applicability date for 326 IAC 8-6-1, Organic Solvent Emission Limitations. Therefore, there are no applicable emission limitations or standards. Any change or modification to existing facilities or

addition of new facilities that would lead to an increase in volatile organic compound (VOC) emissions above exemption thresholds, as specified in 326 IAC 2-1 must be approved by the Office of Air Management before such change, modification or addition can occur.

Compliance Determination Requirements

D.6.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

There are no compliance monitoring requirements applicable to this emission unit.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

No record keeping or reporting is required.

SECTION D.67

FACILITY OPERATION CONDITIONS Insignificant Activities

- One (1) Natural Gas-fired boiler rated at 1.527 MMBtu/hr.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.67.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating) the PM emissions from the 1.527 MMBtu per hour heat input Natural Gas-fired Boiler shall be limited to 0.27 pounds per MMBtu heat input.

This limitation is based on the following equation:

$$Pt = 1.09 / (Q^{0.26}) = 0.27 \text{ lb/MMBtu heat input}$$

where Pt = rate of emission in pounds per MMBtu heat input.
Q = total source maximum operating capacity in MMBtu/hr = 212.727 MMBtu/hr

Compliance Determination Requirements

D.67.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.67.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Comment 29:

Regarding the technical support document, we request that the following changes be made.

Page 1 of 11

The process descriptions for the Black Paint System and Thermoplastic Liner System need to be made

consistent with the comments given above.

Pages 2 and 3 of 11

A reference to the 50 lb Icemaker Foaming Lines should also be included should also be made on the list of insignificant activities.

Page 3 of 11

The reference to three 50,000-gallon fuel oil tanks should be deleted as these are no longer in operation.

Page 8 of 11

The reference to the Thermoplastic Plastic Liner System (EU1) under 326 IAC 6-3-2(c) (Particulate Matter) should be deleted.

The references to the 50 lb Icemaker Foaming Line (EU14) under 326 IAC 6-3-2(c) (Particulate Matter) and 326 IAC 8-1-6 (General Provisions relating to VOC rules) should be deleted.

Pages 9 and 10 of 11

All discussions of Compliance Requirements should be made consistent with changes the emission unit-specific requirements proposed in the body of the permit.

Page 11 of 11

The description of Whirlpool as a minor air toxic/HAP emission source should be corrected to refer to Whirlpool as a major source under Section 112 of the Act.

Response 29:

These changes were accepted and made to the permit, however, the OAM does not make revisions to the Technical Support Document. The following section of the TSD is shown because the 50 lb Icemaker Foaming Line (EU14) is an insignificant activity and ENSR no longer applies.

New Emission Units and Pollution Control Equipment Requiring ENSR

~~The application includes information relating to the construction and operation of the following equipment:~~

~~—One (1) 50 lb. Icemaker Foaming Line, identified as emission unit EU14, with a maximum capacity of producing twenty-eight (28) sets of Icemaker cabinets, lids, and doors per hour and exhausting to stack S14.~~

Comment 30:

Regarding the technical support document, Page 3 of 11, in order to be consistent with the proposed deletion of Condition C.9 in the body of the permit, reference to Insignificant Activity (12) – Asbestos abatement projects regulated by 326 IAC 14-10 should be deleted

Response 30:

Renovation is defined in 326 IAC 14-10-2 (38) as altering a facility or a component of a facility in any way. All areas where renovation or demolition are going to occur must be inspected by an accredited asbestos inspector.

The language in the permit is the same as the Federal language found in 40 CFR 61, Subpart M. Not every renovation must be reported. If the Permittee's renovation will involve stripping, removing or disturbing two hundred sixty (260) linear feet on pipes, one hundred sixty (160) square feet on other facility components; or a total of thirty-five feet (35) cubic feet on all facility components or more of friable asbestos, then the Permittee must notify IDEM using an IDEM notification form at least ten (10) working prior to renovation.

Demolition is defined as removing supporting beams, walls or structures of a facility. 326 IAC 14-10-1(a)(1) states that the Permittee must properly notify IDEM of every demolition project, even if no asbestos is present.

There have been no changes resulting from this comment.

Comment 31:

Regarding the technical support document, Page 3 of 11, the list of other activities or categories not previously identified under item (19) should be amended to delete any reference to the number of touch-up paint spray booths.

Response 31:

The requirement to list the number of insignificant activities present is a general requirement for all Title V permits. In addition, Whirlpool is required to notify the OAM in its annual compliance certification of any and how many new insignificant activities that have been added. There have been no changes resulting from this comment.

Comment 32:

Regarding the technical support document, page 5 of 11, the summary table for potential criteria pollutant emissions should be corrected to note potential SO₂ emissions less than 250 tons per year (tpy). The summary table for potential HAP emissions should be corrected to note that potential emissions for Other HAPs is greater than 10 tpy and TOTAL is greater than 25 tpy.

Response 32:

The potential SO₂ emissions from boilers EU4, EU7, and EU12 exceed 250 tons per year. Please refer to the calculations at Appendix A for further explanation. The OAM accepts that potential emissions for Other HAPs is greater than 10 tpy and TOTAL is greater than 25 tpy, however, the OAM does not make revisions to the Technical Support Document. This revised table is as follows.

HAP's	Potential Emissions (tons/year)
Lead	less than 10
Other HAPs	less greater than 10 each
TOTAL	less greater than 25

Comment 33:

Regarding the technical support document, page 7 of 11, the Construction Permit issued for Boiler No. 3 (EU12), CP-163-8917-00022, was a synthetic minor modification for SO₂ emissions; SO₂ is an attainment pollutant and subject to an applicability evaluation under PSD not the Emission Offset rules. This section should be revised to correctly cite 326 IAC 2-2.

Response 33:

The OAM agrees that the correct citation is 326 IAC 2-2 for evaluation under PSD rules. These changes have been made to the permit, however, the OAM does not make revisions to the Technical Support Document. This revised section is as follows.

326 IAC 2-32 (Emission Offset PSD Minor Modification Limit)

Pursuant to CP-163-8917-00022, issued on December 23, 1997, the input of No. 2 distillate fuel oil to the 33.5 million Btu per hour Boiler No. 3 (identified as EU12) shall be limited to 1,100,000 gallons per 365 consecutive day period, rolled on a daily basis. This production limitation is equivalent to SO₂ emissions of 39 tons per 365 consecutive day period, rolled on a daily basis. Therefore, the ~~Emission Offset PSD~~ rules, 326 IAC 2-32, shall not apply.

During the first 365 days of operation, the No. 2 distillate fuel oil input shall be limited such that monthly fuel input to the 33.5 million Btu per hour Boiler No. 3 shall not exceed 91,600 gallons.